

# **EXHIBIT D**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

TODD TARGGART, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

NEXT BRIDGE HYDROCARBONS, INC.,  
KEN RICE, GEORGE PALIKARAS,  
ROBERT L. COOK, CLIFTON DUBOSE,  
JR., JOSEPH DEWOODY, LUCAS T.  
HAWKINS, DELVINA OELKERS, MIA  
PITTS, KRISTIN WHITLEY, and GREGORY  
MCCABE,

Defendants.

Case No.: 1:24-cv-01927-JAM

Hon. Joseph A. Marutollo

**JOINT DECLARATION IN SUPPORT OF THE MOTION OF THE  
NBH INVESTOR GROUP FOR APPOINTMENT AS LEAD PLAINTIFF**

We, the undersigned, pursuant to 28 U.S.C. § 1746, declare as follow:

1. We, Todd Targgart, Steven Martinez, and Mohammed Limon (the “NBH Investor Group”), respectfully submit this Joint Declaration in support of our Motion for Appointment as Lead Plaintiff and Approval of Selection of Counsel (the “Joint Declaration”). We each have personal knowledge about the information contained in this Joint Declaration as to ourselves.

2. We are informed of and understand the requirements of serving as lead plaintiff pursuant to the Private Securities Litigation Reform Act of 1995 (the “PSLRA”). We understand that each of us could have chosen to pursue individual actions, individual motions for appointment as lead plaintiff, or taken no action and remained absent class members. However, we have decided to move for lead plaintiffs in this case jointly because we believe combining our collective

resources and knowledge will best serve the Class.<sup>1</sup>

3. I, Todd Targgart, as reflected in my Certification, purchased NBH shares during the Class Period and suffered a substantial loss as a result of the violations of the federal securities laws alleged in the Action. I am motivated to recover this loss for my own benefit and the benefit of all members of the Class. I currently reside in Beavercreek, Ohio. I possess a bachelor's degree in business management. I currently work in Sales/Acct. management at CoreLogic, and have been employed with the company for over 34 years. I have been investing for over 40 years. Further, I have experience hiring and overseeing attorneys based on, among other things, my involvement as a named plaintiff in a prior class action lawsuit against Meta Materials. I decided to seek appointment as lead plaintiff with Steven Martinez and Mohammed Limon after learning of their motivation to recover on behalf of investors and that we were each in discussions with our counsel to pursue claims on behalf of the Class.

4. I, Steven Martinez, as reflected in my Certification, purchased NBH shares during the Class Period and suffered a substantial loss as a result of the violations of the federal securities laws alleged in the Action. I am motivated to recover this loss for my own benefit and the benefit of all members of the Class. I currently reside in Corona, California. I am currently employed as an agent for a private armed security company. I have been investing for approximately 9 years. I decided to seek appointment as lead plaintiff with Todd Targgart and Mohammed Limon after learning of their motivation to recover on behalf of investors and that we were each in discussions with our counsel to pursue claims on behalf of the Class.

5. I, Mohammed Limon, as reflected in my Certification, purchased NBH shares during the Class Period and suffered a substantial loss as a result of the violations of the federal

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<sup>1</sup> The "Class" consists of all persons or entities that acquired shares of Next Bridge Hydrocarbons, Inc. ("NBH" or the "Company") in connection with the Company's spin-off from Meta Materials, Inc. ("Meta Materials") on or around December 14, 2022, and were damaged as a result thereof.

securities laws alleged in the Action. I am motivated to recover this loss for my own benefit and the benefit of all members of the Class. I currently reside in Hollis, Queens, New York. I have bachelor's degrees in aviation and business administration. I am currently employed by the New York City Police Department as a traffic enforcement agent. I have been investing for 6 years. I decided to seek appointment as lead plaintiff with Todd Targgart and Steven Martinez after learning of their motivation to recover on behalf of investors and that we were each in discussions with our counsel to pursue claims on behalf of the Class.

6. We, Todd Targgart, Steven Martinez, and Mohammed Limon, believe that the allegations against NBH are meritorious and that the Class will benefit from having highly motivated investors with substantial financial interests at stake like ourselves to control the class action. If appointed lead plaintiffs, our primary goal will be to ensure that the Class achieves the largest possible recovery.

7. We are investors who contacted and retained Levi & Korsinsky, LLP ("Levi & Korsinsky") to represent us in the Action as Lead Counsel. After discussing the allegations against NBH, the procedural background of the Action, the process of appointing a lead plaintiff in cases such as this, and attorneys' fees, we learned of each other's existence and similar willingness to litigate the claims of the Class.

8. On Thursday, April 25, 2024, we participated in a conference call at which time we discussed among other things: the allegations and the strength of the claims against defendants; a strategy for prosecuting the Action; the role of the lead plaintiff and the lead plaintiff selection and litigation process; the benefits that the class would receive from the leadership by investors like us; a shared desire to achieve the best possible result for the class; our interests in prosecuting the case in a collaborative manner; attorney's fees; and the actions that we will take to continue to ensure that the claims will be zealously and efficiently litigated.

9. We believe that the Class will benefit from having three highly motivated investors with substantial financial interests at stake as lead plaintiffs. We feel that our combined efforts and knowledge will better represent the Class as a whole, which is likely made up of the same composition. We decided to work together in order to collaborate and exercise joint decision-making. We agree to work collaboratively to represent all NBH shareholders who suffered damages to ensure that the Class achieves the largest recovery possible.


10. We each understand that, if appointed, we would act in the best interests of the Class during the course of the litigation to provide effective representation and to ensure that Lead Counsel effectively litigates the Action. If appointed as lead plaintiffs, we agree to actively manage the prosecution of the Action including reviewing documents, having joint calls, discussing through email any developments, participating in discovery, and exercising joint decision-making to execute a strategy to maximize the recovery of the entire Class. We are confident in our ability to reach joint decisions regarding litigation matters and will use consensus decision making to maximize the recovery for the Class. However, if ever there is a disagreement between us that cannot be resolved, we will take a simple majority vote, with each of us possessing one vote.

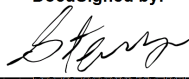
11. We select Levi & Korsinsky to serve as Lead Counsel on behalf of the Class and believe Levi & Korsinsky has the experience and ability to effectively and expeditiously bring the Action to a close and achieve a strong recovery on behalf of the Class. We are familiar with the experience, resources, and successes of our proposed Lead Counsel, Levi & Korsinsky. We are well aware that Levi & Korsinsky is an accomplished law firm with a history of achieving significant settlements and corporate governance reforms with defendants. Indeed, we believe that the firm's prior experience of effectively litigating complex class action lawsuits will provide comfort that the proposed Class will receive the best possible representation. We also believe that Levi & Korsinsky will vigorously prosecute the Action in a cost-effective manner and in the best


interests of all members of the putative Class.

12. It is our goal to resolve the Action in an expeditious manner that is fair to all members of the Class. Through supervision of our chosen counsel, Levi & Korsinsky, we will ensure that the Action is prosecuted for the benefit of the Class in an efficient and effective manner. In that regard, we will direct Levi & Korsinsky to prosecute the Action in such a way to achieve a fair result for all members of the Class. We have implemented communication procedures to ensure that we can quickly communicate and make decisions on short notice. We understand that we may call for a meeting or conference call at any time, including on an emergency basis if necessary. We understand that meetings, conference calls, and communications may be conducted without counsel. We agree to contact one another when necessary to facilitate the best interests of the Class and to prosecute the Action. We do not foresee any problems communicating with one another or staying abreast of the progress of the litigation.

We, Todd Targgart, Steven Martinez, and Mohammed Limon, declare under the penalty of perjury that the foregoing is true and correct.

DocuSigned by:  
  
063458C811F4479...  
Todd Targgart

DocuSigned by:  
  
DC1246C0856B431...  
Steven Martinez

DocuSigned by:  
  
1E716AF2DC4B403...  
Mohammed Limon